

#### CPG's Primary Concerns with EPA FFS Model:

1. The model does not predict net upstream sediment transport and infilling during low flows, which is a key process identified in the System Understanding Document.
2. It appears that the model predicts little recontamination in remediated areas. Based on COPC levels in surface sediment upstream of the Dundee Dam and in Newark Bay and in sediments upstream of RM 8, we expect significant recontamination for many COPCs, including PCBs.
3. There has been insufficient effort to ensure that the model predicts realistic COPC movement between the bed and the water column. This movement affects transport, identification of areas of maximum flux (used for the "targeted alternative") and COPC accumulation by the food web. Without demonstrating that the model's predictions of this movement are realistic, there is little confidence in its ability to predict the benefits of remediation.
4. EPA's sediment transport and contaminant fate and transport (CFT) model calibration efforts have been focused on the LPR without including Newark Bay. The exchange with Newark Bay is central to the predictions in the LPR as there is upstream movement of sediment and associated COPCs during low flows.
5. The CFT calibration shows a significant impact of the high flows that occur after 2008. This response is outside of the period of sediment data used to define the recovery target (1995 to 2008). These impacts are also seen in the projections, in which the calibration hydrograph is cycled repeatedly. Given its influence on both calibration and projections, the response to high flow events should be validated within the sediment transport and CFT models.